

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

Diane Bitel,

Plaintiff.

Case No:

VS

The Hartford

Hon.

Defendant.

MARK A. AIELLO (P54870)
Attorney for Plaintiff
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COMPLAINT

Plaintiff, Diane Bitel, by and through her attorney, Mark A. Aiello, says as follows:


1. Plaintiff is a resident of, Dearborn, Wayne County, MI.
2. Defendant The Hartford is a Connecticut corporation, which is doing business in Wayne County, MI.
3. This court has jurisdiction pursuant to ERISA, 29, U.S.C. §1132€ and 28 U.S.C. §1131.
4. Venue in this Court is appropriate because the actions complained herein occurred in the EASTERN DISTRICT OF MICHIGAN.
5. Plaintiff was the beneficiary of a long-term disability program issued by The Hartford with her employer the Target Corporation as policy holder.
6. Defendant has denied Plaintiff's appeal of its decision denying continuing long-term disability benefits after February 27, 2014.
7. Plaintiff has exhausted all required administrative appeals prior to bringing this action.
8. Plaintiff's claim seeks to recover benefits, enforced rights, including clarified right to future benefits under 29 U.S.C. §1132(a)(i)(B).

9. Defendant's denial of Plaintiff's long-term benefits was arbitrary and capricious, not supported by substantial evidence and is in violation of the terms of the long-term disability plan.

WHEREFORE, Plaintiff requests this Honorable Court enter judgment for Plaintiff against Defendant for damages, including past, present and future long term disability benefits and attorney fees pursuant to 29 U.S.C. §1132, and any other relief this Court deems equitable, just and proper.

Dated: February 22, 2017

Respectfully Submitted,



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